

EDWARD H. KUBO, JR.  
United States Attorney  
District of Hawaii

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

ELLIOT ENOKI  
First Assistant U.S. Attorney

LESLIE E. OSBORNE, JR.  
Assistant U.S. Attorney  
Room 6100, PJKK Federal Building  
300 Ala Moana Blvd., Box 50183  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850

JUL 25 2002  
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at o'clock and 35 min.  
WALTER A. Y. H. CHINN, CLERK

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA, ) CR. NO. CR 02-00328 SOM  
 )  
 Plaintiff, ) INDICTMENT  
 )  
 vs. ) [8 U.S.C. §§ 1324(a)(1)(A)(iv)  
 ) and (v); 1324(a)(2)(B)(ii)]  
 ANAND SHARMA, )  
 )  
 Defendant. )  
 )

INDICTMENT

COUNT 1

The Grand Jury charges that:

1. From on or about December 29, 1999, till on or about July 15, 2002, the Defendant, ANAND SHARMA, conspired in the District of Hawaii and elsewhere with persons known and unknown to the grand jury to encourage and induce aliens to come to, enter, and reside in the United States, knowing and in

reckless disregard of the fact that such coming to, entry and residence would be in violation of law.

2. It was part of the manner and means of the conspiracy that members of the conspiracy would recruit persons in the Republic of India and elsewhere who were interested in being smuggled to the United States (hereinafter "smugglees").

3. It was part of the manner and means of the conspiracy that the Defendant would transport the smugglees to the United States from various locations in Asia by commercial air.

4. It was part of the manner and means of the conspiracy that the Defendant would be paid amounts ranging from ~~20,000~~ ~~25,000~~ ~~700~~ \$2,000 to \$2,500 U.S., by an agent who presented the money upon the Defendant's successful completion of the smuggling into the United States of aliens who were, as the Defendant well knew, not entitled to enter the United States.

5. The Defendant, ANAND SHARMA, brought various illegal aliens into the United States on the dates and locations set out below:

	<u>Date</u>	<u>Location</u>
1 woman	December 29, 1999	New York, NY
1 woman	March 15, 2001	New York, NY
1 woman	June 30, 2001	New York, NY
1 woman	November 4, 2001	Seattle, WA
1 woman	December 22, 2001	Honolulu, HI
1 woman	March 18, 2002	New York, NY
1 woman	July 15, 2002	Honolulu, HI

6. It was part of the manner and means of the conspiracy that the smugglees were given the Defendant's wife's passport on which the photograph had been altered, and using that document the smugglees would attempt to enter the United States.

7. It was part of the manner and means of the conspiracy that the Defendant, ANAND SHARMA, would accompany the aliens, provide them with his wife's passport, and fill out entry documents for the smugglee.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv) and (v).

COUNT 2

The Grand Jury further charges that:

On or about December 22, 2001, in the District of Hawaii, the Defendant, ANAND SHARMA, for the purpose of commercial advantage or private financial gain, brought and attempted to bring an alien, name unknown, to the United States, knowing and in reckless disregard of the fact that the unknown alien had not received prior authorization to come, enter, and reside in the United States, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

COUNT 3

The Grand Jury further charges that:

On or about July 15, 2002, in the District of Hawaii,

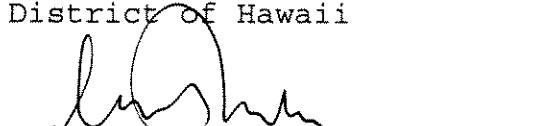
the Defendant, ANAND SHARMA, for the purpose of commercial advantage or private financial gain, brought and attempted to bring RBP, an alien, to the United States, knowing and in reckless disregard of the fact that RBP had not received prior authorization to come, enter, and reside in the United States, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii).

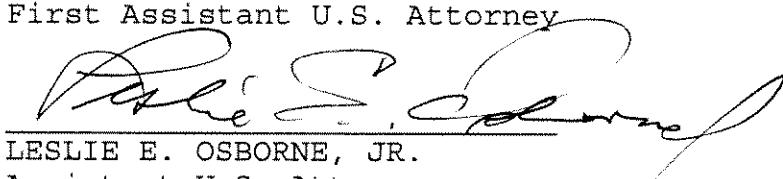
DATED: Jul 25, 2002 at Honolulu, Hawaii.

A TRUE BILL

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FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.  
United States Attorney  
District of Hawaii

  
ELLIOT ENOKI  
First Assistant U.S. Attorney

  
LESLIE E. OSBORNE, JR.  
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United States v. Anand Sharma  
Cr. No. \_\_\_\_\_  
"Indictment"